pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

November 13, 2017

Mr. James Feeney
Remedial Project Manager
U.S. EPA Region III (3HS21)
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Wade (ABM) Site

Dear Mr. Feeney,

This letter is in response to your most recent letter dated May 12, 2017 regarding long-term Operations and Maintenance (O&M) and a subsequent groundwater monitoring program required of the Pennsylvania Department of Environmental Protection (DEP) at the Wade (ABM) Site (Site). Enclosed, please find the most recent round of results for groundwater sampling conducted in May,2017. Based on the data, DEP will no longer sample groundwater monitoring wells. DEP plans to properly decommission all of the groundwater monitoring wells.

In your letter dated October 21, 2015 denying our request to cease groundwater monitoring and the subsequent abandonment of all monitoring wells at the Site, you state that US EPA's policy is that target cleanup goals must be achieved prior to approving the cessation of groundwater monitoring at a Site, and that the cleanup goals for the Site are Maximum Contaminant Levels (MCLs). The Record of Decision (ROD) for the Site, does not define the cleanup goals for groundwater nor is there any mention of meeting drinking water MCLs. The ROD does state *"Therefore, due to the negligible impact of ground water on the off-site environment and public health, groundwater interception and withdraw remedial actions were eliminated from further consideration."*

Groundwater sampling, conducted from 2006 to 2017 by DEP, has shown a steady decline in the concentrations of Volatile Organic Compounds (VOCs), which are currently well below their highest levels: Benzene concentrations in MW-2 decreased by approximately 93% since 2006, from a high of 120µg/L to 7.9µg/L, just above the drinking water MCL of 5µg/L.

DEP believes groundwater concentrations will continue to decrease by natural attenuation, and that continued sampling and monitoring of groundwater at the Site is no longer needed. DEP also believes that Institutional Controls should be implemented which would prevent future groundwater use.

As we have discussed before, a majority of the wells are in a state of disrepair due to heavy vehicle traffic, and exposure to harsh riverbank weather conditions for more than 12 years. As

a result, well covers are no longer secure and, as such, provide a direct point of contamination if a release were to occur at this location. The unsecured well covers also pose a direct hazard to the public that visit this recreational area and sports arena. With DEPs O&M obligations expiring in less than 2 years, DEP does not believe that it is in the best interest of the Commonwealth to expend taxpayer money to repair and modernize these wells for continued sampling.

DEP appreciates the opportunity to discuss the cessation of groundwater sampling and subsequent decommissioning of the Wade (ABM) Site wells, and would look forward to meeting about this request. If you have any questions regarding this matter, please feel free to contact me by email at bmcclennen@pa.gov or by telephone at 484.250.5965.

Sincerely,

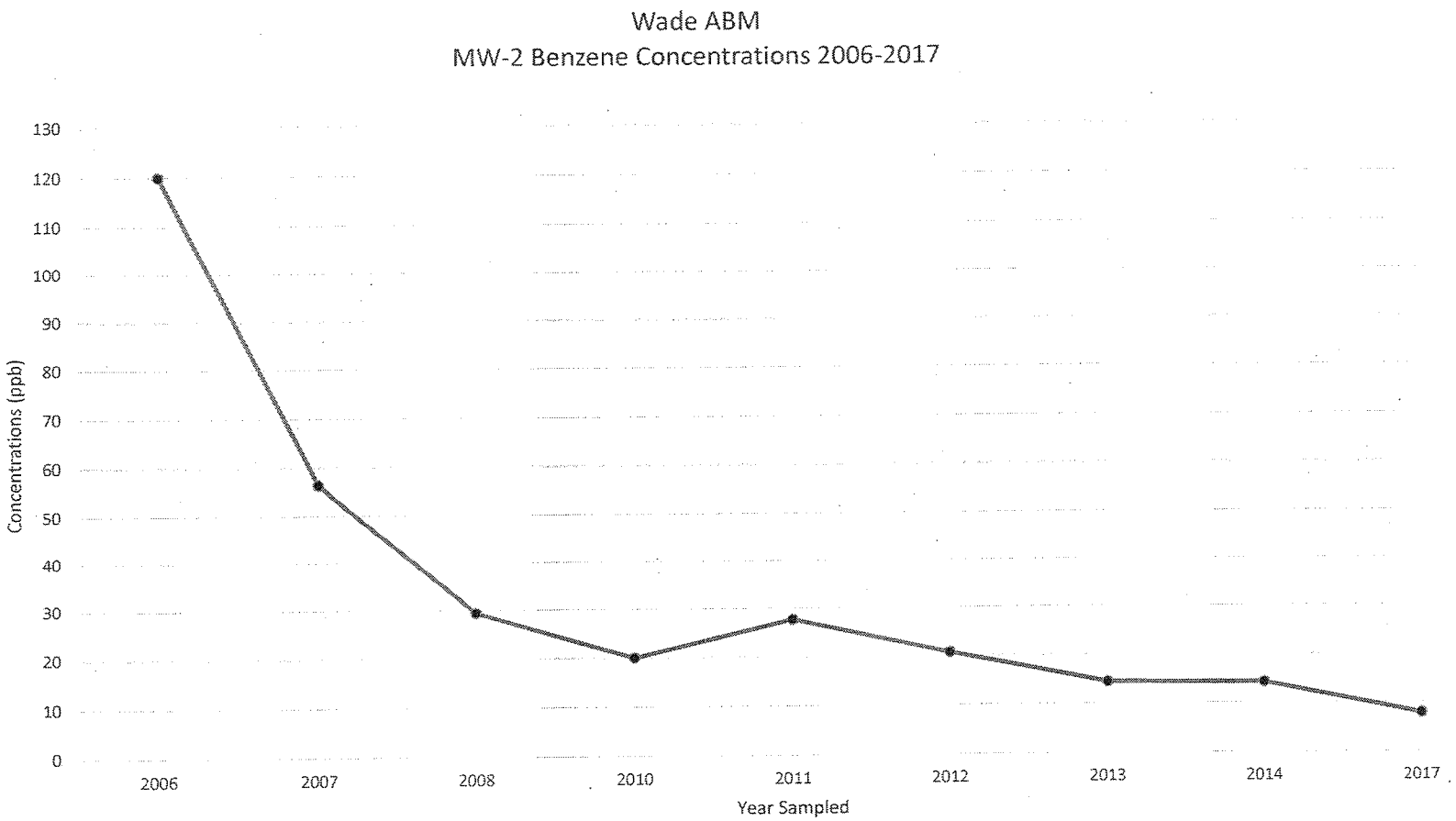
Bonnie McClennen
Solid Waste Supervisor
Environmental Cleanup and Brownfields

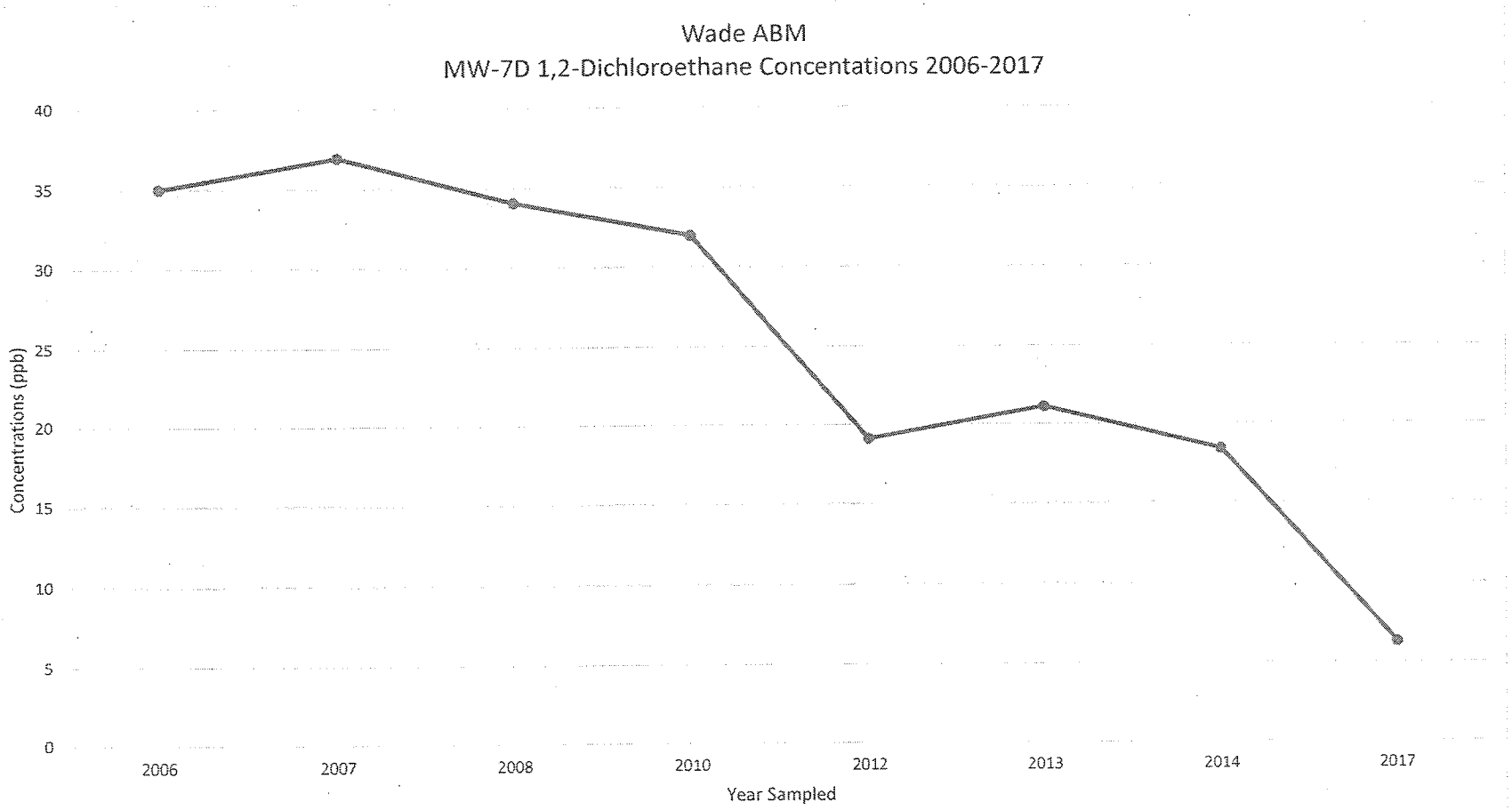
Enclosures

cc Ms. Matzko- US EPA
Ms. Dietz – US EPA
Mr. R. Patel - w/o enclosure
Mr. Crooks - w/o enclosure
Ms. Pantelidou, PG - w/o enclosure
Ms. Wagner - w/o enclosure
Ms. McMullen - w/o enclosure
File
Re 30 (rc17ecb) 313.2

**Wade - Summary of VOCs Remaining over the MSCs**

| MW-1D | MSC | 2006 | 2007 | 2008 | 2010 | 2011 | 2012 | 2013 | 2014 | 2017 |
|---|---|---|---|---|---|---|---|---|---|---|
| 1,2-Dichloroethane | 5 | 11 | 8.7 | 7.6 | 7.2 | | | | | |
| 1,2-Dichloropropane | 5 | 28 | 21.6 | 10.2 | 7.8 | | | | | |
| | | | | | | | | | | |
| **MW-2** | | | | | | | | | | |
| 1,2-Dichloropropane | 5 | | 7.3 | | | | | | | |
| Benzene | 5 | 120 | 56.4 | 29.3 | 20 | 27.6 | 20.7 | 14.4 | 14.2 | 7.9 |
| | | | | | | | | | | |
| **MW-3** | | | | | | | | | | |
| Benzene | 5 | 9 | 7.4 | | | 7.2 | | | | |
| | | | | | | | | | | |
| **MW-5S** | | | | | | | | | | |
| Benzene | 5 | 5 | | 5.7 | | | | | | |
| Chlorobenzene | 100 | | | 146 | | | | | | |
| | | | | | | | | | | |
| **MW-7D** | | | | | | | | | | |
| 1,2-Dichloroethane | 5 | 35 | 36.9 | 34.1 | 32 | 0 | 19.1 | 21.1 | 18.4 | 6.3 |
| | | | | | | | | | | |
| **MW-8** | | | | | | | | | | |
| Benzene | 5 | 34 | 18.3 | 14.1 | 15 | | | | | |


Wade ABM
MW-2 Benzene Concentrations 2006-2017
Concentrations (ppb)
130
120
110
100
90
80
70
60
50
40
30
20
10
0
2006
2007
2008
2010
2011
2012
2013
2014
2017
Year Sampled


Wade ABM
MW-7D 1,2-Dichloroethane Concentations 2006-2017
Concentrations (ppb)
40
35
30
25
20
15
10
5
0
2006
2007
2008
2010
2012
2013
2014
2017
Year Sampled